

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
Dyshanna Dozier	:	
	:	No. 21-12764-AMC
Debtor	:	

MOTION TO DETERMINE VALUATION OF SECURED
DEBT OF CREDITOR ALLY BANK

Debtor, Dyshanna Dozier, by attorney Brad J. Sadek, makes the following Motion to Determine Valuation of Secured Debt held by Ally Bank and in support hereof states the following:

1. Debtor filed the above Chapter 13 Petition on October 7, 2021.
2. Debtor financed a 2015 Nissan Pathfinder through Ally Bank on or about February 21, 2018.
3. The value of the debtor's 2015 Nissan Pathfinder on or about the time of filing of this case was approximately \$17,488.00. See Exhibit "A".
4. Creditor, Ally Bank, filed a secured Proof of Claim on November 9, 2021(Claim No. 16-1) in the amount of \$30,121.62 with an interest rate of 13.15%. The Proof of Claim lists the vehicle's current value as \$21,150.00. See Exhibit "B."
5. The debtor's vehicle was purchased over 910 days prior to the date of filing and can be considered for a "cram down" at the proposed vehicle value of \$17,488.00 under 11 USC § 506(A)(2).

WHEREFORE, Debtor, by Attorney Brad J. Sadek, respectfully requests this Honorable Court enter an Order to Determining the Valuation of the Secured Debt at \$17,488.00 at 6% and for such further relief as necessary.

/s/ Brad J. Sadek
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Dated: 12/28/21